

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA
WESTERN DIVISION**

United States of America,)	
)	
Plaintiff,)	
)	
vs.)	Case Nos. 1:24-cr-137 and 1:24-cr-138
)	
Jaseyona Sage Thomas,)	
)	
Defendant.)	

DEFENDANT’S MOTION TO MODIFY CONDITIONS OF RELEASE

COMES NOW the Defendant, Jaseyona Sage Thomas (“Ms. Thomas”), by and through her attorney Joshua L. Weatherspoon of Mulloy Law, PLLC, who respectfully requests the Court to modify her conditions of release to allow her to reside at a sober living facility Blessed Builders in Bismarck, North Dakota.

Following the detention hearing, the Court found it was appropriate for Ms. Thomas to be released from the custody of the United States Marshalls to reside at the Prairie Recovery Center. Doc. Nos. 40 & 44. In the Court’s *Order Setting Conditions of Release*, the Court ordered that Ms. Thomas reside and attend treatment at Prairie Recovery Center. Doc. No. 44. Ms. Thomas was released on October 21, 2024 and has resided at Prairie Recovery Center since. Ms. Thomas is nearing her graduation date from residential treatment at the Prairie Recovery Center. Ms. Thomas’s graduation date is December 23, 2024.

Ms. Thomas has applied and was accepted to reside at sober living at Blessed Builders in Bismarck, North Dakota. Exhibit 1. Ms. Thomas would be transported from Prairie Recovery Center on December 23, 2024 by a member of the MHA Recovery Team to Blessed Builders, where she would reside. Ms. Thomas believes that Blessed Builders is an appropriate facility for

her and gives her the ability to continue to work on her sobriety. Additionally, Ms. Thomas has remained engaged in this process and compliant with the requirements of Prairie Recovery Center.

Based on the foregoing, Ms. Thomas respectfully requests that the Court modify her conditions of release to allow her to reside at Blessed Builders Sober Living after the completion of her treatment at Prairie Recovery Center.

Dated this 12th day of December, 2024.

JOSHUA L. WEATHERSPOON

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By:

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